



Juan Antonio Lozada &lt;juan@tximmigrationlaw.com&gt;

---

**You last diatribe;**

1 message

---

**Steve Kardell** <skardell@kardelllawgroup.com>

Sun, Apr 5, 2020 at 7:57 PM

To: Juan Antonio Lozada &lt;juan@tximmigrationlaw.com&gt;

Cc: Alexandra Hicks &lt;alexandra@tximmigrationlaw.com&gt;, Theodore Garber &lt;tgarber@txcivillitigation.com&gt;

Noted.

Please remind Teddy any motion he files to remove me has to comply with certificate of conference rules, meaning sending a pre-filing copy to both me and Barcus.

Steve Kardell

*Board Certified Labor & Employment Law; Texas Board of Legal Specialization***KARDELL** | LAW GROUP**4514 Cole Avenue, Suite 600  
Dallas, Texas 75205**

Direct: 214-616-4654

Exh 3

Secure Fax: 469-729-9926

Email: [skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)

Website: [www.dallaswhistleblowerlawyer.com](http://www.dallaswhistleblowerlawyer.com)



---

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is **LEGALLY PRIVILEGED**. The information contained in this e-mail is intended only for the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified any dissemination, distribution or copying of this communication is **STRICTLY PROHIBITED**. If you have received this communication in error, please immediately notify us by telephone (214-707-2466), and destroy the original message. Thank You.

**From:** Juan Antonio Lozada <[juan@tximmigrationlaw.com](mailto:juan@tximmigrationlaw.com)>

**Sent:** Sunday, April 5, 2020 2:17 PM

**To:** Steve Kardell <[skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)>

**Cc:** Alexandra Hicks <[alexandra@tximmigrationlaw.com](mailto:alexandra@tximmigrationlaw.com)>; Theodore Garber <[tgarber@txcivillitigation.com](mailto:tgarber@txcivillitigation.com)>

**Subject:** Re: "Bar complaint" against SK? Motion to remove SK from this case?

Mr Kardell,

The only problem that I have is that you seem to have lost your mind, nobody has made any misrepresentation to the clerk or anyone, nobody is abusing the discovery process and the only person that is harassing anyone is you, I have never asked you to do anything unethical or improper and you are making this ridiculous and unsupported claim for the first time now because you were fired and only then you began to make up a bunch of ridiculous allegations in order to save yourself from a grievance and a lawsuit, do not write to me again, you are clearly mentally infirmed and anyone reading our communications back and forth since this case started will know that you are an incompetent and have mishandled this litigation, you have zero way to support these recent claims, you are a liar, plain and simple, Juan Lozada

On Sun, Apr 5, 2020 at 1:05 PM Steve Kardell <[skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)> wrote:

OK, I can easily deal with these threats.

You, however, have more serious problems.

A. Blatant misrepresentations to the Clerk's office:

For example, how do you plan to explain your blatant misrepresentations to the Clerk's office? This is a serious violation and would, standing alone, be potentially sanctionable by the Court.

represented by **Juan Antonio Lozada**  
The Law Office of Juan Antonio Lozada, PLLC  
3305 West Slaughter Lane, Second Floor  
Austin, TX 78748  
787.808.0070  
Fax: 866.586.5513  
Email: [juan@tximmigrationlaw.com](mailto:juan@tximmigrationlaw.com)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

B. Looks like Barcus is all over this as well:

9. On March 11, 2020, Plaintiff filed his own Application to Appear Pro Hac Vice. [Dkt. No. 60.] As of the date of these Objections, the application has *not* been approved, or at least approval is not reflected on the copy of the application available online. For reasons unclear to Defendants, however, Plaintiff is listed as counsel of record for himself on the Court's docket.

As Barcus' brief indicates here, your curious request here is legally unsupportable and will likely be rejected.

Exh 3

C. Overall abuse of discovery process:

- (1) Taking into consideration the ALJ case, this is the second time you have tried this, for the same motive, e.g., harassment, abuse of discovery, etc.;
- (2) your reasons for attempting to remove me are because of my continued opposition to your directives to abuse discovery here;
- (3) most significantly, it can be easily established to the court here that your goal here is harassment, abuse of discovery, personal vendetta against MoneyGram, etc.
- (4) I have multiple examples here (the most recent example is listing that extensive group of witnesses, most of whom have no relationship to this case), but there are many more examples of your ongoing attempts to abuse the discovery process.

I realize that it would likely be improper for me to volunteer this information to both the Court and Barcus, if you file a motion to remove me, the Court could obviously inquire about this conduct on your part, and could possibly even sanction you *sua sponte*.



Steve Kardell

**Board Certified Labor & Employment Law; Texas Board of Legal Specialization**

**KARDELL** | LAW GROUP

**4514 Cole Avenue, Suite 600  
Dallas, Texas 75205**

Direct: [214-616-4654](tel:214-616-4654)

Secure Fax: [469-729-9926](tel:469-729-9926)

Email: [skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)

Website: [www.dallaswhistleblowerlawyer.com](http://www.dallaswhistleblowerlawyer.com)



---

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is **LEGALLY PRIVILEGED**. The information contained in this e-mail is intended only for the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified any dissemination, distribution or copying of this communication is **STRICTLY PROHIBITED**. If you have received this communication in error, please immediately notify us by telephone (214-707-2466), and destroy the original message. Thank You.

---

**From:** Juan Antonio Lozada <[juan@tximmigrationlaw.com](mailto:juan@tximmigrationlaw.com)>  
**Sent:** Sunday, April 5, 2020 9:41 AM  
**To:** Alexandra Hicks <[alexandra@tximmigrationlaw.com](mailto:alexandra@tximmigrationlaw.com)>; Steve Kardell <[skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)>  
**Cc:** Theodore Garber <[tgarber@txcivillitigation.com](mailto:tgarber@txcivillitigation.com)>  
**Subject:** Re: No SK voluntary withdrawal

Ted, do not communicate with Mr Kardell, he has clearly lost his bearings, he has been terminated from this case and is now trying to get disbarred.

I will start drafting the bar complaint tomorrow.

Ted, please work on a motion to remove SK from this case.

Juan

On Sun, Apr 5, 2020 at 2:01 AM Steve Kardell <[skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)> wrote:

I'm assuming you understood what I said about striking any pleading in this case that I have not seen prior to its filing

**(Sent from my iPad; please excuse typos, etc.)**

Steve Kardell

*Board Certified Labor & Employment Law; Texas Board of Legal Specialization*

**KARDELL LAW GROUP**

4514 Cole Avenue, Suite 600  
Dallas, Texas 75205

Direct: 214-616-4654

Secure Fax: 469-729-9926

Email: [skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)

Website: <http://www.dallaswhistleblowerlawyer.com>

---

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is LEGALLY PRIVILEGED. The information contained in this e-mail is intended only for the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified any dissemination, distribution or copying of this communication is STRICTLY PROHIBITED. If you have received this communication in error, please immediately notify us by telephone (214-707-2466), and destroy the original message. Thank You.

On Apr 4, 2020, at 5:07 PM, Juan Antonio Lozada <[juan@tximmigrationlaw.com](mailto:juan@tximmigrationlaw.com)> wrote:

Steve, you are now misrepresenting the truth, you are so desperate to save yourself that you are now making stuff up, I continue to accumulate damages sir, never made the amount per year that I was making at MGI, you know so little about this case and about me that you

Exh 3

keep writing checks you can cash and seem to forget that I know that, you have been fired from this case and if you file anything to sabotage this case you will need to answer to the bar for that as well, Juan

On Sat, Apr 4, 2020 at 4:04 PM Steve Kardell <[skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)> wrote:

Juan, the more I think about this situation, and you having overplayed your hand here (by attacking me) I've decided not to voluntarily withdraw at this point and retain my position as lead counsel in this case and will not withdraw unless ordered by the court.

**Please advise Teddy that before he files any pleadings in this case, he needs to send me a draft for my approval.**

I don't anticipate a whole lot of problems here, but I'm going to insist on this before he files anything.

In other words, just following the normal procedure as far as my responsibilities as lead counsel are here.

Please be advised that if you instruct him to file something without giving me the opportunity to look at it first, then **I will immediately file a motion to strike that** pleading and explain some of your unethical practices in this case to the court (which are numerous).

Your transparent attempts to take depositions here are clearly calculated to bully, harass, and intimidate witnesses.

In that regard, I think there's plenty of evidence (such as the fact that you have ceased to have any actual damages in this case some time ago) that this case has morphed into nothing more than a personal vendetta on your part against MoneyGram for perceived lack of respect or some other motive unrelated to legitimate SOX litigation.

Most federal judges often see this problem, i.e., former-employee/litigants that can't seem to separate legitimate issues in dispute from their own emotions, and they usually aren't reluctant to order sanctions in these situations, sometimes dispositive sanctions.

<image009.png>

Steve Kardell

***Board Certified Labor & Employment Law; Texas Board of Legal Specialization***

<image010.png>

**4514 Cole Avenue, Suite 600  
Dallas, Texas 75205**

Direct: [214-616-4654](tel:214-616-4654)

Secure Fax: [469-729-9926](tel:469-729-9926)

Email: [skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)

Website: [www.dallaswhistleblowerlawyer.com](http://www.dallaswhistleblowerlawyer.com)

<image011.jpg>

<image012.jpg>

<image013.png>

<image014.png>

<image015.png>

<image016.png>

---

**This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is **LEGALLY PRIVILEGED**.**  
**The information contained in this e-mail is intended only for the individual or entity named above. If the reader of this message**

EX-13



is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified any dissemination, distribution or copying of this communication is **STRICTLY PROHIBITED**. If you have received this communication in error, please immediately notify us by telephone (214-707-2466), and destroy the original message. Thank You.

---

**From:** Steve Kardell  
**Sent:** Saturday, April 4, 2020 1:41 AM  
**To:** Juan Antonio Lozada-Leoni - Ex-MoneyGram (juan@tximmigrationlaw.com) <juan@tximmigrationlaw.com>  
**Cc:** Theodore Garber <tgarter@txcivillitigation.com>  
**Subject:** RE: Discovery; Red herring issue

Anybody with any knowledge of "kickout" litigation would recognize this as a red herring.

<image017.jpg>

Steve Kardell

***Board Certified Labor & Employment Law; Texas Board of Legal Specialization***

<image010.png>

**4514 Cole Avenue, Suite 600  
Dallas, Texas 75205**

Direct: 214-616-4654

Secure Fax: 469-729-9926

Email: skardell@kardelllawgroup.com

Website: [www.dallaswhistleblowerlawyer.com](http://www.dallaswhistleblowerlawyer.com)

<image011.jpg>

<image012.jpg>

<image013.png>

<image014.png>

<image015.png>

<image016.png>

---

**This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is **LEGALLY PRIVILEGED**. The information contained in this e-mail is intended only for the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified any dissemination, distribution or copying of this communication is **STRICTLY PROHIBITED**. If you have received this communication in error, please immediately notify us by telephone (214-707-2466), and destroy the original message. Thank You.**

---

**From:** Steve Kardell  
**Sent:** Saturday, April 4, 2020 1:19 AM  
**To:** Juan Antonio Lozada-Leoni - Ex-MoneyGram ([juan@tximmigrationlaw.com](mailto:juan@tximmigrationlaw.com)) <[juan@tximmigrationlaw.com](mailto:juan@tximmigrationlaw.com)>  
**Cc:** Theodore Garber <[tgarber@txcivillitigation.com](mailto:tgarber@txcivillitigation.com)>  
**Subject:** Discovery

I suggest you save your energies that currently seem to be focused on blaming me for your problems in this case and let's discuss how to address this red herring discovery objection that Barcus has filed.

My sense is that an appropriate response to the Magistrate will fix this problem quickly.

Finally, I suggest you make it a priority to associate local counsel, preferably someone who practices before this Judge on a regular basis, and get a better feel for whether a personal attack on me or Bob Weber will advance your ball here.

<image017.jpg>

Steve Kardell

***Board Certified Labor & Employment Law; Texas Board of Legal Specialization***

<image010.png>

**4514 Cole Avenue, Suite 600  
Dallas, Texas 75205**

Direct: [214-616-4654](tel:214-616-4654)

Secure Fax: [469-729-9926](tel:469-729-9926)

Email: [skardell@kardelllawgroup.com](mailto:skardell@kardelllawgroup.com)

Website: [www.dallaswhistleblowerlawyer.com](http://www.dallaswhistleblowerlawyer.com)

<image011.jpg>

<image012.jpg>

<image013.png>

<image014.png>

<image015.png>

<image016.png>

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is **LEGALLY PRIVILEGED**. The information contained in this e-mail is intended only for the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified any dissemination, distribution or copying of this communication is **STRICTLY PROHIBITED**. If you have received this communication in error, please immediately notify us by telephone (214-707-2466), and destroy the original message. Thank You.

--

**Juan Antonio Lozada**, *Attorney at Law*

---

Phone: (512) 296-5033  
Texas State Bar No: 24046320  
Austin: 3305 W Slaughter Ln, 2nd Floor, Austin, Texas 78748  
Fax: 866-586-5513  
Website: [tximmigrationlaw.com](http://tximmigrationlaw.com)  
*The Law Office of Juan Antonio Lozada, PLLC*

--

**Juan Antonio Lozada**, *Attorney at Law*

---

Phone: (512) 296-5033  
Texas State Bar No: 24046320  
Austin: 3305 W Slaughter Ln, 2nd Floor, Austin, Texas 78748  
Fax: 866-586-5513  
Website: [tximmigrationlaw.com](http://tximmigrationlaw.com)  
*The Law Office of Juan Antonio Lozada, PLLC*

5/17/2020



--

**Juan Antonio Lozada**, *Attorney at Law*

---

Phone: (512) 296-5033

Texas State Bar No: 24046320

Austin: 3305 W Slaughter Ln, 2nd Floor, Austin, Texas 78748

Fax: 866-586-5513

Website: [tximmigrationlaw.com](http://tximmigrationlaw.com)

*The Law Office of Juan Antonio Lozada, PLLC*